

EXHIBIT 153

Exhibit
0005

I, J. Alex Halderman, declare and state as follows:

1. “My name is J. Alex Halderman. I am Professor of Computer Science and Engineering, Director of the Center for Computer Security and Society, and Director of the Software Systems Laboratory at the University of Michigan in Ann Arbor. I hold a Ph.D. (2009), a master’s degree (2005), and a bachelor’s degree (2003), *summa cum laude*, in computer science, all from Princeton University. My background, qualifications, and professional affiliations are set forth in my curriculum vitae, which is attached as **Exhibit O-1**.

2. “My research focuses on computer security and privacy, with an emphasis on problems that broadly impact society and public policy. Among my areas of research are software security, network security, computer forensics, and election cybersecurity. I have authored more than 90 articles and books, and my work has been cited in more than 12,000 scholarly publications. I have served as a peer-reviewer for more than 35 research conferences and workshops.

3. “I have published numerous peer-reviewed research papers analyzing security problems in electronic voting systems used in U.S. states and in other countries. I have also investigated methods for improving election security, such as efficient techniques for auditing whether computerized election results match paper ballots. I regularly teach courses in computer security, network security, and election cybersecurity at the graduate and undergraduate levels. I am the creator of *Securing Digital Democracy*, a massive, open, online course about computer security and elections that has attracted more than 20,000 students.

4. “I serve as co-chair of the State of Michigan’s Election Security Advisory Commission, by appointment of the Michigan Secretary of State. I have also performed security testing of electronic voting systems for the Secretary of State of California. I have testified before

the U.S. Senate Select Committee on Intelligence and before the U.S. House Appropriations Subcommittee on Financial Service and General Government on the subject of cybersecurity and U.S. elections.

5. “I received the John Gideon Award for Election Integrity from the Election Verification Network, the Andrew Carnegie Fellowship, the Alfred P. Sloan Foundation Research Fellowship, the IRTF Applied Networking Research Prize, the Eric Aupperle Innovation Award, the University of Michigan College of Engineering 1938E Award for teaching and scholarship, and the University of Michigan President’s Award for National and State Leadership.

6. “I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

Dr. Eric Coomer

7. “There is not, and has never been, credible evidence that the outcome of the 2020 Presidential election was “rigged” by anyone, let alone by Dr. Eric Coomer. Election security experts and public officials have reiterated this countless times, beginning shortly after the election, yet Defendants ignored these authorities and instead advanced baseless conspiracy theories. In an apparent attempt to promote their own political agendas regardless of the truth, they portrayed Dr. Coomer as a criminal who had somehow manipulated enough votes to deny victory to Donald Trump. Defendants’ vote-rigging allegations were always implausible, consisting of wild speculation, readily debunked claims, and incoherent technical assertions, and months of subsequent investigations and audits have both failed to vindicate their theories and added further evidence that the election outcome was correctly decided.

8. “Dr. Coomer was not a public figure prior to Defendants’ conduct. In my 15 years working in the election security field, I encountered him on only two occasions prior to Election Day 2020. The first time was on February 2, 2019, at the National Association of Secretaries of State winter conference, which I attended. There, Dr. Coomer staffed Dominion’s vendor booth and demonstrated the company’s equipment. He knew me by reputation and introduced himself; I did not know who he was. Later, on September 15, 2020, Dr. Coomer testified about Dominion’s equipment at a preliminary injunction hearing in *Curling v. Raffensperger* (1:17-CV-2989-AT, N.D. Ga.), a lawsuit regarding the security of Georgia’s election system. I testified as an expert witness for the opposing party in the same hearing. Although Dr. Coomer and I disagreed about certain technical issues, our interactions impressed on me that he was a man of principle who shared my goal of safeguarding election integrity.

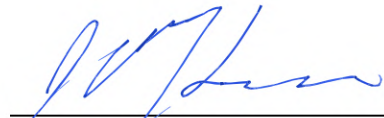
There was Never Credible Evidence that the Presidential Result was “Rigged”

9. “While I and other scientists have warned for many years that there are security weaknesses in voting systems sold by all major vendors,¹ credible election security experts have never claimed that such vulnerabilities were actually exploited to alter the outcome of an election in the United States. Technical, physical, and procedural safeguards complicate the task of maliciously exploiting election systems, as does the distributed nature of U.S. elections. Monitoring of likely adversaries by law enforcement and the intelligence community increases the probability that an attempted attack would be discovered and foiled. Merely citing the existence

¹ As the National Academies recently concluded, “There is no realistic mechanism to fully secure vote casting and tabulation computer systems from cyber threats.” National Academies of Science, Engineering, and Medicine, *Securing the Vote: Protecting American Democracy* (2018) at p. 92. Available at <https://doi.org/10.17226/25120>.

by Defendants and others like them, who spread lies and distortions to undermine the legitimate winner and advance their own political ends.

59. “I declare under penalty of the perjury laws of the State of Colorado and the United States that the foregoing is true and correct and that this declaration was executed this 31st day of August, 2021 in Ann Arbor, Michigan.”



J. ALEX HALDERMAN, Declarant